

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

-----  
ETHICON WAVE 13 CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF  
BRUCE S. KAHN, M.D. FOR WAVE 13**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply filed in relation to Bruce S. Kahn, MD for Ethicon Wave 11, Dkt. 8565 (motion), Dkt. 8566 (memorandum in support) and Dkt. 8660 (reply). Plaintiffs respectfully request that the Court exclude Bruce S. Kahn's testimony, for the reasons expressed in the Wave 11 briefing. This notice applies to the following Wave 13 cases identified in Exhibit A attached hereto.

Dated: December 11, 2019

Respectfully submitted,

/s/ D. Renee Baggett

Renee Baggett, Esq.

Bryan F. Aylstock, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

(850) 202-1010

(850) 916-7449 (fax)

E-mail: [rbaggett@awkolaw.com](mailto:rbaggett@awkolaw.com)

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL

Wagstaff & Cartmell LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

816-701-1102

Fax 816-531-2372

[tcartmell@wcllp.com](mailto:tcartmell@wcllp.com)

## **EXHIBIT A**

Breen, Susan	18cv01275
Gonzalez, Diana & Robert	18cv01295
Rentaria, Marie	18cv01550
Risley, Debra & Bruce	13cv05338

**CERTIFICATE OF SERVICE**

I hereby certify that on December 11, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett  
D. RENEE BAGGETT  
Aylstock, Witkin, Kreis and Overholtz, PLC  
17 E. Main Street, Suite 200  
Pensacola, FL 32563  
850-202-1010  
850-916-7449  
[Rbaggett@awkolaw.com](mailto:Rbaggett@awkolaw.com)